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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

D.M.P., a minor child by and through his legal guardian, ANNIE POMPA MOREJON; C.V.P. a minor child by and through his legal guardian, RUBY PEREZ CHINO; C.R.C., a minor child by and through his legal guardian, AMERICA CARDONA; J.P., a minor child by and through his legal guardian, JESENIA PLASCENCIA; D.P., a minor child by and through his legal guardian, MARGARET PETNEAUD; E.R., a minor child by and through his legal guardian FANNY LOPEZ; and A.M., a minor child by and through his legal guardian ADRIANA MUÑOZ,

Plaintiffs,

VS.

BEECH-NUT NUTRITION COMPANY, INC.; GERBER PRODUCTS COMPANY; PLUM PBC, d.b.a. PLUM ORGANICS; SPROUT FOODS, INC.; WALMART, NC.; HAIN CELESTIAL GROUP INC.; and NURTURE INC.

## Defendants.

Case No.: 2:23-cv-00344-CDS-EJY

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE FOR  
HAIN AND NURTURE TO RESPOND TO  
FIRST AMENDED COMPLAINT**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiffs, through their counsel Morris, Sullivan & Lemkul, LLP; Brady Law Group, Inc.; Wisner Baum, LLP; Wagstaff Law Firm; Claggett & Sykes Law Firm; and Walsh Law PLLC, and Defendants Hain Celestial Group, Inc. ("Hain"), through their counsel Peterson Baker, PLLC, and Nurture, LLC (formerly known as Nurture, Inc.) ("Nurture"), by and through their counsel Evans Fears Shuttert McNulty Mickus, that

1 both Hain and Nurture shall have a 30-day extension up to and including January 17, 2024, in which  
2 to answer or otherwise respond to Plaintiffs' First Amended Complaint [ECF No. 74]. This  
3 stipulation is submitted and based upon the following:

- 4 1. Defendants Hain and Nurture were served with a copy of the Summons and First Amended  
5 Complaint on November 27, 2023, and their respective responses to the First Amended  
6 Complaint are currently due on December 18, 2023.
- 7 2. Due to the complexity of the claims asserted and due to the upcoming holidays, additional  
8 time is needed by both Hain and Nurture in order to respond to the First Amended  
9 Complaint [ECF No. 74].
- 10 3. The parties agree and jointly request the Court grant an extension of the deadline for both  
11 Hain and Nurture to answer or otherwise respond to the First Amended Complaint up to  
12 and including January 17, 2024.
- 13 4. This is the first request for an extension of time for either Hain or Nurture to file a proposed  
14 response to the First Amended Complaint and good cause exists for this request.
- 15 5. This request is made in good faith and not for the purpose of delay.

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Nothing in this Stipulation, nor the fact of entering into the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 18<sup>th</sup> day of December, 2023.

/s/ Will Lemkul  
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*Attorneys for Defendant Hain Celestial Group, Inc.*

IT IS SO ORDERED.

Elayne J. Bouchard  
UNITED STATES MAGISTRATE JUDGE

DATED: December 18, 2023